

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

GEORGE ANTHONY DEVOLDER SANTOS,  
Also known as "George Santos"

*Defendant.*

23-cr-197 (S-1) (JS) (AYS)

**NOTICE OF DEFENDANT  
GEORGE SANTOS' OMNIBUS  
MOTIONS**

PLEASE TAKE NOTICE, that upon the annexed declaration of Andrew Mancilla, Esq. dated the 3rd day of May 2024, and the accompanying Memorandum of Law and exhibits attached thereto, the defendant GEORGE ANTHONY DEVOLDER SANTOS, by his attorneys Joseph Murray, Esq. and Mancilla & Fantone, LLP, will move this Court before the Honorable Joanna Seybert, at the United States District Court for the Eastern District of New York located at 100 Federal Plaza, Central Islip, New York, 11722, at a date and time to be fixed by the Court, for an Order:

1. Dismissing the aggravated identity theft charges (Counts 6 and 10) of the Superseding Indictment ("S1 Indictment") for failure to state an offense;
2. Dismissing the aggravated identity theft charges (Counts 6 and 10) of the S1 Indictment because 18 U.S.C. § 1028A is unconstitutionally vague on its face and unconstitutionally vague as applied to these allegations;
3. Dismissing Count 10 of the S1 Indictment on grounds of multiplicity;
4. Dismissing Count 19 of the S1 Indictment on grounds of duplicity;
5. Compelling the government to provide a bill of particulars;
6. Compelling the government to provide *Brady/Giglio* material;
7. Striking prejudicial and irrelevant surplusage from the S1 Indictment;

8. Compelling the government to preserve;
9. Permitting the defense to make further motions if the circumstances require; and
10. granting any and all further relief the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Santos requests that the Court conduct an evidentiary hearing to resolve any factual issues concerning these motions.

Dated: May 3, 2024  
New York, New York

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To: All parties of record via ECF